

INGA L. PARSONS, ESQ.

Admitted to MA NY WY
Federal Courts
U.S. Supreme Court

BY ECF

March 9, 2020

Hon. Valerie E. Caproni
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

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MEMO ENDORSED

Re: *United States v. Velez* (Christian Nelson), ~~19-cr-289~~ (VEC)
19-CR-862

Dear Judge Caproni:

I was appointed to represent Christopher Nelson under the Criminal Justice Act on December 5, 2019, who is charged in the above-referenced case with a racketeering enterprise, drug conspiracy and firearm charge in a 17-defendant indictment.

Counsel is writing to request approval for an associate to work more than ten hours in this matter. The discovery against her client is extensive and the Court has approved the appointment of a discovery liaison. Counsel respectfully requests that the Court authorize her associate to assist her with review and analysis of the discovery as well as legal research for potential motions in excess of 10 hours.

Counsel respectfully requests authorization for an initial approval of 100 hours at \$110 hours (the most recent amount approved in another case where counsel's associate is also working) without prejudice to seeking authority for additional time should the review go beyond the 100 hours.

Counsel had thought she had filed this right after she was appointed on December 5, 2020 (she picked up 7 cases three of which are significant discovery cases and associate counsel was approved in the other two substantial cases and counsel just realized that she had neglected to file the request in the Nelson's case having been away on out of state litigation and family medical commitments for the past three weeks) and asks that the request be nunc pro tunc to her appointment date of December 5, 2020.

The request is DENIED without prejudice. Ms. Parsons must identify the associate, provide his or her resume, and explain his or her suitability to assist in this matter, no later than **March 20, 2020**.

SO ORDERED.

Date: 03/10/2020

Valerie Caproni

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

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Thank you for your consideration in this matter

Respectfully,

/s/ Inga L. Parsons

Inga L. Parsons

Cc: All counsel of record via ECF